

**UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

BASIC SOLUTIONS LTD. CO.,

Plaintiff and Counter-Defendant

V.

JUAN MANUEL GONZALEZ VEGA
D/B/A GMA TRADING AND GMA
TRADING CORP.,

Defendants and Counter-Plaintiffs

and

JAVIER GONZALEZ,

Third-Party Defendant

§ § § § § § § § § § § § § §

Civil Action No. 4:23-CV-04824

EXPERT DESIGNATION

Defendants/Counter-Plaintiffs GMA Trading Corp. (“**GMA Trading**”) and Juan Manuel Gonzalez Vega d/b/a GMA Trading (“**González-Vega**”) hereby serve this *Expert Designation*:

G. Michael Gruber
Greenberg Traurig LLP
2200 Ross Ave, Ste 5200
Dallas, Texas 75201
(214) 665-3600

It is anticipated that Mr. Gruber will testify on matters pertaining to reasonable and necessary attorneys' fees, including the nature and amount of legal work performed and to be performed in this case by Greenberg Traurig LLP; the fees charged and/or incurred by Greenberg Traurig LLP for the work performed and to be performed through the trial of this case and entry of judgment; the reasonableness of the hours expended and the rates charged by Greenberg Traurig LLP through trial and judgment; the hours expended, the rates charged, and the expenses incurred

by Greenberg Traurig LLP; any segregation of fees, including with respect to the amount of attorneys' fees and expenses incurred determining, correcting, or otherwise litigating the matters in dispute; the fees that would be incurred by Greenberg Traurig LLP in the event of any appeal of the outcome in this case; the reasonableness and necessity of the fees charged and incurred, or that would be incurred in the event of any appeal; and rebuttal of other expert and factual testimony related to the issues above.

He will testify based on his education, skill, knowledge, training, and experience in the practice of law as a Board Certified in Civil Trial Law by the Texas Board of Legal Specialization and licensed attorney in the State of Texas; his knowledge about this case; and upon a review of the fee statements reflecting the fees Plaintiff allegedly incurred and the fees Defendants have incurred. His resume can be found at <https://www.gtlaw.com/en/professionals/g/gruber-g-michael>.

Defendants reserve the right to call any witnesses designated by any other party, or cross examine any witness called by any other party, and receive opinion testimony, without agreeing that any such witnesses are experts.

Defendants reserve the right to supplement and/or amend this expert designation.

Dated: February 3, 2025

Respectfully Submitted,

/s/ Christina M. Carroll

GREENBERG TRAURIG, LLP

Christina M. Carroll

State Bar No. 24092868

Federal ID No. 3133759

Christina.Carroll@gtlaw.com

Matthew C. Thomas

State Bar No. 24125950

Federal ID No. 3736068

Matthew.Thomas@gtlaw.com

GREENBERG TRAURIG, LLP

2200 Ross Avenue, Suite 5200

Dallas, Texas 75201

(214) 665-3600 (telephone)

(214) 665-3601 (facsimile)

Daniel Pulecio-Boek

(Admitted *pro hac vice*)

pulecioboekd@gtlaw.com

GREENBERG TRAURIG, LLP

2101 L Street N.W., Suite 1000

Washington, D.C. 20037

Telephone: 202.331.3117

Facsimile: 202.331.3101

***Attorneys for Juan Manuel González-Vega
and GMA Trading Corp.***

CERTIFICATE OF SERVICE

I hereby certify the foregoing was served on the following attorneys of record by electronic mail on February 3, 2025:

Javier Gonzalez
Jackson Walker
1401 McKinney, Suite 1900
Houston, TX 77010
Telephone (713) 752-4453

***Attorney for Plaintiff
Basic Solutions Ltd. Co.***

/s/ Christina M. Carroll

Christina M. Carroll